

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
MEMPHIS DIVISION**

<b>KENNETH E. SAVAGE, JR.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	
	)	
<b>FEDERAL EXPRESS CORPORATION d/b/a FEDEX EXPRESS and FEDEX CORPORATION EMPLOYEES' PENSION PLAN,</b>	)	<b>2:14-cv-02057-STA-dkv</b>
	)	
<b>Defendants.</b>	)	

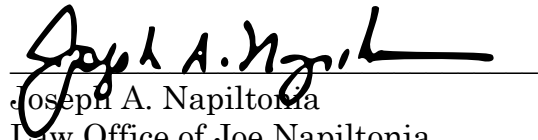
**DECLARATION OF JOSEPH A. NAPILTONIA**

I, Joseph A. Napiltonia, declare under penalty of perjury under the laws of the United States of America state that the foregoing is true and correct:

1. I am an attorney licensed to practice law in the State of Tennessee and a member in good standing of the Bar.
2. The facts contained herein are from my personal knowledge.
3. I represent Plaintiff Kenneth E. Savage, Jr. in the instant action.
4. On July 28, 2015, I emailed Terrence Reed, Esq., Defendants' counsel three spreadsheets detailing Mr. Savage's damages, including his retirement benefits.<sup>1</sup> See attached Exhibit A.
5. I also agreed to allow Mr. Reed to question my client *after Mr. Savage's deposition was completed* regarding those damages calculation spreadsheets via telephone while I was at FedEx's headquarters.

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<sup>1</sup>The damages spreadsheets were previously filed as Exhibit A to Second Declaration of Kenneth E. Savage, Jr. (Doc. 104-2)

A handwritten signature in black ink, appearing to read "Joseph A. Napiltonia", is written over a horizontal line.

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